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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

<p>JASON ALAN, Individually, And On) Behalf Of All Others Similarly Situated,) Plaintiff,) v.) MERCHANT CASH CLOUD, et al,) Defendant.) _____)</p>	<p>Case No. 2:15-cv-04500-SVW-MRW JOINT STIPULATION OF DISMISSAL OF ACTION WITH PREJUDICE AS TO THE NAMED PLAINTIFF AND WITHOUT PREJUDICE AS TO THE PUTATIVE CLASS</p>
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NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

The notice and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to the parties' settlement and dismissal of this putative class action because this action has not been certified as a class.¹

¹ Federal Rule of Civil Procedure 23(e) states "[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court's approval.

1 The Parties agree that this Court can proceed to dismiss this Action entirely
2 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
3 Class alleged in the complaint.

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5 Respectfully submitted this 2nd day of February, 2016

6 By: s/Todd M. Friedman, Esq.
7 TODD M. FRIEDMAN
8 Attorney for Plaintiffs

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10 By: s/David A. Van Riper, Esq.
11 DAVID A. VAN RIPER
12 Attorneys for Defendant

1 Filed electronically on this 2nd day of February, 2016, with:

2 United States District Court CM/ECF system

3 Notification sent electronically via the Court's ECF system to:

4
5 Honorable Stephan V. Wilson
6 United States District Court
7 Central District of California

8
9 David A. Van Riper
10 VAN RIPER LAW

11 This 2nd day of February, 2016

12
13 s/Todd M. Friedman, Esq.
14 TODD M. FRIEDMAN